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Attorneys For Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

LAURI BELL, ANGELA HAYES, MARY HENDERSON AND JULIA ROSENSTEIN, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

AFFILIATED COMPUTER SERVICES, INC., a Delaware corporation, ACS
COMMERCIAL SOLUTIONS, INC., a Nevada corporation, **LIVEBRIDGE, INC.**, an Oregon corporation, and **DOEs 1 - 10**,

Defendants.

Case No.: 6:09-cv-1307-AA

PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT.

Fed. R. Civ. P. 23

Oral Argument Requested

Date: July 13, 2012

Time: 10:00 am

Hon. Thomas M. Coffin

Pursuant to Local Rule 7.1, Plaintiffs' counsel certifies that they have conferred with Defendants' counsel regarding this motion. Defendants join in this motion.

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MOTION

Pursuant to Federal Rule of Civil Procedure 23, Plaintiffs, individually and on behalf of the proposed Settlement Class, move the Court to preliminarily approve the proposed settlement and direct notice of the settlement be mailed to Settlement Class Members. Plaintiffs also request that the attorneys from the law firm of Bailey, Pinney & Associates, LLC be appointed as Class Counsel. See declaration of J. Dana Pinney. Plaintiffs request that Kurtzman Carson Consultants be appointed as the Claims Administrator of this settlement. See declaration of J. Dana Pinney. Plaintiffs request that they be appointed as class representatives. Plaintiffs rely on the memorandum filed in support of this motion and the declaration of J. Dana Pinney. Plaintiffs also request that the Court set a final approval hearing or October 22, 2012 or reasonably thereafter.

Dated: July 12, 2012

Bailey, Pinney and Associates, LLC

/s/ Karen A. Moore
KAREN A. MOORE, OSB 040922
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(360) 567-2551
Attorney for Plaintiffs

CERTIFICATE OF SERVICE
Bell et al. v. Affiliated Computer Services, Inc., et al
Case No. 06:09-cv-1307-AA

I hereby certify that I caused to be served the foregoing **MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** upon:

Clarence M. Belnavis
Fisher & Phillips, LLP
111 SW Fifth Ave, Suite 1250
Portland, OR 97204
Fax: (503) 242-4263
Attorney for Defendants

by the following indicated method(s):

[X] by electronic mailing through the CM/ECF system, in accordance with Fed. R. Civ. P. 5(d), on July 12, 2012.

Dated: July 12, 2012

Bailey, Pinney and Associates, LLC

/s/ Karen A. Moore
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